

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD.;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST, INC.'S
OPPOSITION TO SAMSUNG'S MOTION FOR PARTIAL SUMMARY
JUDGMENT OF NONINFRINGEMENT CONCERNING THE '912 PATENT
(DKT. 353)**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Opposition to Samsung’s Motion for Partial Summary Judgment of Noninfringement Concerning the ’912 Patent (Dkt. 353). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts of Exhibit A regarding General Infringement to the Opening Expert Report of Dr. William Henry Mangione-Smith, dated November 20, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of the transcript of the deposition of Sungyub Jang, dated November 10, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of Exhibit B regarding the ’912 Patent to the Opening Expert Report of Dr. William Henry Mangione-Smith, dated November 20, 2023.

5. Attached as **Exhibit 4** is a true and correct copy of U.S. Patent No. 7,619,912 to Bhakta et al., dated November 17, 2009, with certificates of correction and re-examination.

6. Attached as **Exhibit 5** is a true and correct copy of Exhibit A-1 regarding U.S. Patent No. 7,619,912 C1 – DDR4 Exemplary Claim Chart to Netlist’s Disclosure of Asserted Claims and Infringement Contentions, dated November 17, 2022.

7. Attached as **Exhibit 6** is a true and correct copy of the transcript of the deposition of Seungmo Jung, in Netlist v. Samsung, no. 2:21-cv-463, dated September 28, 2022.

8. Attached as **Exhibit 7** is a true and correct copy of excerpts of an IDT Data Sheet

titled 4RCD0124KC0, DDR4 Register Command Address Buffer with Parity, dated December 14, 2015, bearing Bates numbers beginning SAM-NET-293_00086961.

9. Attached as **Exhibit 8** is a true and correct copy of a Renesas Short-Form Data Sheet titled 4RCD0232KC1, DDR4RCD02 Register Command Address Buffer and Parity, revision 1.00, dated October 26, 2021.

10. Attached as **Exhibit 9** is a true and correct copy of excerpts of a Samsung Data Sheet titled DDR4 SDRAM Specification, revision 1.1, dated October 2014, bearing Bates numbers beginning SAM-NET-293_00000961.

11. Attached as **Exhibit 10** is a true and correct copy of the confidential Exhibit B to Samsung's Interrogatory Responses, dated November 6, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 30, 2024, in Marshall, Texas.

By /s/ Jason G. Sheasby
Jason G. Sheasby